

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

**JOE BLAKELY, as Personal Representative  
of the Estate of George Blakely Jr., deceased,**

**Plaintiff,**

**vs.**

**No. 08-C-3783**

**TRI-COUNTY FINANCIAL GROUP, INC.,  
doing business as First State Bank of Mendota,  
and FIRST STATE BANK, INC.**

**Judge Der-Yeghiayan**

**Magistrate Judge Keyes**

**Defendant.**

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**PLAINTIFF'S MOTION FOR EXTENSION  
OF TIME TO FILE INITIAL STATUS REPORT**

Plaintiff Joe Blakely, by his attorneys, James J. Stamos and George M. Hoffman of Stamos & Trucco LLP, hereby moves this Court for an extension of time to file the Initial Status Report and Joint Jurisdictional Status Report, and in support thereof states as follows:

1. Pursuant to the Court's July 7, 2008 Order, the Initial Status Report and Joint Jurisdictional Status Report are due to be filed on September 3, 2008.
2. This deadline cannot be met because neither Defendant has been served with process.
3. After filing the complaint, Plaintiff sought to avoid the costs of litigation by attempting to resolve this claim with the Defendants. When those attempts did not prove fruitful, the Plaintiff proceeded with service of process.
4. As of this date, the Plaintiff has been unable to effectuate service on the Defendants despite several attempts, because the Defendants' registered agent and President has been unavailable.

5. Because the Defendants have not answered the complaint, we believe that filing the Initial Status Report and Joint Jurisdictional Status Report would be premature.

WHEREFORE, Plaintiff requests that this Court enter an order extending the deadline to file the Initial Status Report and Joint Jurisdictional Status Report until 15 days after the Defendants answer or otherwise plead and resetting the hearing until seven business days after the status report is due.

JOE BLAKELY, as Personal Representative  
of the Estate of George Blakely, Jr.,  
deceased

By: /s/ George M. Hoffman

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